



GROUND WATER PROTECTION COUNCIL

**RESOLUTION 03-3
REQUESTING MODIFICATION OF THE POLLUTION PREVENTION RANKING
FOR UNDERGROUND INJECTION AS A WASTE MANAGEMENT METHOD**

WHEREAS, the United States Environmental Protection Agency (USEPA) has concluded that underground injection into Class I wells is one of the safest and most effective methods for managing wastes, including hazardous wastes; and

WHEREAS, underground injection in Class I wells results in the removal of wastes from the accessible human environment and the isolation of injected wastes in deep geologic formations where various transformation mechanisms may work as effectively as some treatment methods to render the wastes nonhazardous; and

WHEREAS, underground injection of wastes into deep geologic injection zones is often a safer, more effective, and environmentally more protective method for managing wastes than various alternative treatment methods in site-specific contexts; and

WHEREAS, current USEPA and other pollution prevention hierarchial rankings are not consistent with these facts and determinations by USEPA; and

WHEREAS, such inconsistent hierarchial rankings only serve to restrict the otherwise justifiable and even preferable use of Class I underground injection wells under circumstances where the use of these wells to manage process or remediation wastes will provide better, more cost effective and more environmentally protective results;

NOW THEREFORE BE IT RESOLVED, that the Board of Directors of the Ground Water Protection Council requests the USEPA to take whatever rule making steps, and encourages Congress to enact whatever statutory revisions are necessary, to allow risk-based determinations of the most appropriate ranking of Class I underground injection wells on the pollution prevention hierarchy, and the selection of the most appropriate risk-based approach for managing process or remediation wastes at any specific site, facility, or unit.

September 17, 2003
Passed by the Board

Attest

Michel J. Paque, Secretary